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*Attorneys for EB-5 Plaintiffs*

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

In re

1 MIN, LLC; HOTEL AT SOUTHPORT, LLC; and TWELFTH FLOOR, LLC,

## Debtors.

## Chapter 11

Lead Case No. 24-01519

(Jointly Administered)

Adv. Proc. No. 25-80007

LAN CAI, SHUJIE CHEN, TIANRAN  
CHEN, WEIJUN CHEN, JIE CHU,  
ZHAOJUN CONG, HE CUI, JIANYING  
DING, JICHUN DU, QING DU, JIEYING  
FENG, YUPENG GAO, YIRAN HAN,  
JINYANG HU, NAIXIN HU, XIAO HUANG,  
JUNMEI JIN, XIN MENG, WEIHONG LU,  
YUANYUAN MA, MIN PAN, LEI PEI, HAO  
QI, XIAO RONG, JUAN SHAO, HUI

**DECLARATION OF  
MATTHEW J.  
LIVINGSTON  
IN SUPPORT OF  
PLAINTIFFS' MOTION  
FOR PROTECTIVE  
ORDER**

DECLARATION OF MATTHEW J. LIVINGSTON IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
PROTECTIVE ORDER



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1       WANG, JINGYI WANG, YUQUAN WANG,  
2       ZIDONG WANG, RONGRONG WU,  
3       ZHAOHUI XU, QI XU, JIE YAN, KE  
4       YANG, QIN YANG, HONGYUN YU,  
5       SHUXIAN ZENG, XIAOHONG ZHANG,  
6       YING ZHAO, MINBO ZHOU, NAN ZHOU,  
7       HUIQING ZHU, ZILING ZENG, LUYI  
8       ZHANG, JUNDI LIANG, TAO LI, YUN CAI,  
9       HONGLIANG TANG, JIE TANG,  
10      WENLUNG CHEN, SHI ZHANG, JUN CHE,  
11      DAHE ZHANG, SHAN WAN, XIAOHONG  
12      SUN, YAN LYU A/K/A YAN LU, WENYAN  
13      WANG, JIALIN TIAN, RUI TANG,  
14      XINHAN LIN, SIYU LIU, JIANYING  
15      MENG, PHUONG NGUYEN, YEQING PAN,  
16      XUERONG QI, QIANG WANG, JUNLI  
17      WEI, YUNFEI WU, HONGYING YU,  
18      DONGLI ZHANG,

19      Plaintiffs,

20      v.

1       HOTEL AT SOUTHPORT, LLC, TWELFTH  
2       FLOOR, LLC, 1 MIN, LLC.

3       Defendants,

4       and

5       WF CREL 2020 GRANTOR TRUST,

6       Intervenor-Defendant.

7       DECLARATION OF MATTHEW J. LIVINGSTON IN  
8       SUPPORT OF PLAINTIFFS' MOTION FOR  
9       PROTECTIVE ORDER

10      25-80007-FPC Doc 31-2 Filed 04/22/25 Entered 04/22/25 11:31:23 Pg 2 of 7



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1 I, Matthew J. Livingston, declare as follows:

2

3 1. I am the attorney of record for each Plaintiff in the above-captioned

4 adversary proceeding.

5 2. Attached hereto are the following exhibits, which are accurate to the

6 best of my knowledge:

7 a. **Exhibit 1:** An example deposition notice for Plaintiff Dahe

8 Zhang, which is substantively identical (other than the time of

9 deposition) to the deposition notices sent to each Plaintiff by

10 Defendants in the above-captioned adversary proceeding.

11 b. **Exhibit 2:** A summary of all seventy (70) deposition notices sent

12 by Defendants to Plaintiffs in the above-captioned adversary

13 proceeding.

14 c. **Exhibit 3:** A summary of the current country-of-residence of

15 each Plaintiff in the above-captioned adversary proceeding.

16 I declare under penalty of perjury under the laws of the State of Washington  
17 that the foregoing is true and correct.

18 Dated: April 22, 2025.

19 Respectfully submitted,

20 

Matthew J. Livingston Esq.  
Reid & Wise LLP  
One Penn Plaza, Suite 2015

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## Exhibit 1

## DEPOSITION NOTICE OF PLAINTIFF DAHE ZHANG

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## EXHIBIT 2

## Summary Table of Deposition Notices

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### Exhibit 3

## **Current Country of Residence Information for All Plaintiffs**

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